

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**STEPHEN McCULLOM, et al.,  
Plaintiffs,**

**v.**

**BRAD LIVINGSTON, et al.,  
Defendants.**

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**CIVIL ACTION NO. 3:12-CV-02037**

**DEFENDANT UTMB'S RESPONSE TO PLAINTIFFS' MOTION TO QUASH  
AND DEFENDANT'S MOTION TO COMPEL DEPOSITIONS**

**Exhibit B**

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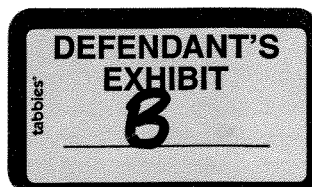
STEPHEN MCCOLLUM, et al, )  
Plaintiffs, )  
V. ) C.A. No. 3:12-CV-02037  
BRAD LIVINGSTON, et al, )  
Defendants. )

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ORAL DEPOSITION OF  
STEPHANIE KINGREY  
November 22, 2013

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ORAL DEPOSITION OF STEPHANIE KINGREY, produced as a  
witness at the instance of the Defendant University of  
Texas Medical Branch and duly sworn, was taken in the  
above-styled and numbered cause on the 22nd of  
November, 2013, from 12:09 p.m. to 3:25 p.m., before  
DEBRA L. MCGREW, CSR in and for the State of Texas,  
reported by machine shorthand at the offices of  
Edwards Law, 1101 E. 11th Street, Austin, Texas,  
pursuant to the Federal Rules of Civil Procedure.



1 A. Not at that point, no.

2 Q. As far as you know, did he ever take any  
3 medications for diabetes?

4 A. Not that I know of.

5 Q. Do you know -- are you aware of him ever being  
6 diagnosed with diabetes?

7 A. He told me before he went in to Waco that he  
8 was a diabetic.

9 Q. And was that a surprise to you?

10 A. No, because it runs in the family.

11 Q. Okay. And did you ask him whether he was  
12 taking any medication for that?

13 A. No.

14 Q. Did you have any concerns about how he might  
15 pay for medication for that diabetes?

16 A. My guess?

17 Q. Uh-huh.

18 A. Yeah.

19 Q. I'm sorry?

20 A. Yes.

21 Q. You --

22 A. I didn't know how he would pay for it if he had  
23 to.

24 Q. Okay. And did you ever ask him, Hey, Dad,  
25 you're not working, how are you paying for your diabetes

1 medication?

2 A. I'm not aware of him being on any medication

3 so --

4 Q. Okay.

5 A. -- I don't know.

6 Q. Did you ever ask him about it?

7 A. No.

8 Q. What did y'all talk about?

9 A. My kids.

10 Q. Do you know whether he was ever diagnosed with

11 high blood pressure?

12 A. Not that I'm aware of.

13 Q. And are you aware of him ever taking any

14 medication for high blood pressure?

15 A. No.

16 Q. Did you ever call any State services and ask

17 for help on your dad's behalf?

18 A. No.

19 Q. What about MHMR in McLennan County?

20 A. No.

21 Q. Does he have -- does your father have any

22 daughters besides you?

23 A. No.

24 Q. Did you ever become aware of whether your dad

25 had any hallucinations relating either to mental illness

1 A. We already have.

2 Q. Okay. I'm almost done. Sorry. Hang on.

3 (Discussion off the record).

4 Q. (BY MS. COOGAN) Do you know how much money  
5 your dad made working for Yellow Cab?

6 A. No.

7 Q. Do you know the name of your dad's primary care  
8 physician?

9 A. No.

10 Q. Do you know the name of any of the doctors that  
11 might have seen or treated your dad in, let's say,  
12 the years in between Bonham and Hutchins?

13 A. If anybody, it would have been Hillcrest.

14 Q. And probably the emergency room?

15 A. Or one of their clinics.

16 Q. Okay. But in the Hillcrest system?

17 A. Yes.

18 Q. What makes you say that?

19 A. Because they're all tied together.

20 Q. And that was sort of his place of choice?

21 A. Right.

22 Q. Did you ever make any request for records under  
23 the Open Records Act, do you know?

24 A. Not that I'm aware of.

25 Q. Did you consider your dad to be disabled?

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1                   A.     No.

2                   MS. COOGAN: I'm going to pass the  
3     witness.

4                   MR. STONE: Do you want to take lunch  
5     right now? Do you mind if we take a lunch break?

6                   MR. MEDLOCK: If that's what y'all would  
7     prefer.

8                   MS. COOGAN: Okay.

9                   (Lunch recess from 1:24 to 2:43).

10                                   EXAMINATION

11     BY MR. STONE:

12                 Q.     Hi, Ms. McCollum.

13                 A.     Hello.

14                 Q.     Do you understand that you're under oath today?

15                 A.     Yes.

16                 Q.     Is this your first deposition?

17                 A.     No.

18                 Q.     How many depositions have you participated in  
19     before?

20                 A.     One other.

21                 Q.     What was that deposition about?

22                 A.     The wreck my dad was in.

23                 Q.     And when was that?

24                 A.     When was --

25                 Q.     What year was that?